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March 24, 2023

Dated: March 27, 2023

New York. New York

Application **DENIED**. The Court does not typically adjourn the initial pretrial conference pending the filing of an answer or other response to the Complaint.

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Via ECF

Hon. Lorna Gail Schofield U.S. District Court, Southern District of New York 500 Pearl Street New York, New York 10007

Re: Steve Sands v. Ziff Davis, LLC

Docket No: 1:23-cv-01517-LGS

Dear Judge Schofield:

We are the attorneys for Plaintiff Steve Sands ("Plaintiff") in the above-referenced matter. Pursuant to § I.B(2) of Your Honor's Individual Practices, Plaintiff, with consent of Defendant Ziff Davis, LLC ("Defendant"), respectfully move this Court for an adjournment of the Initial Conference, currently scheduled for April 12, 2023. In support, Plaintiff includes the following:

- (1) Pursuant to the Court's March 22, 2023, Order, Defendant was granted an extension of time to file its Answer or otherwise move. Defendant's current deadline to Answer or otherwise move in response to the Complaint is April 24, 2023. [Dkt. No. 11].
- (2) The extension of Defendant's time places Defendant's deadline to respond to the Complaint after the Initial Conference, which is currently scheduled for April 12, 2023, at 4:00 p.m. as well as after the April 5, 2023, deadline for the parties to file their joint letter and joint Proposed Civil Case Management Plan and Scheduling Order. [Dkt. No. 8].

In light of the April 24, 2023 deadline for Defendant to Answer or otherwise appear, Plaintiff respectfully requests that the current Initial Conference, scheduled for April 12, 2023, be adjourned to May 12, 2023, and that the April 5, 2023, filing deadline for the Initial Conference be extended to May 5, 2023. This is Plaintiff's first request for an adjournment of the Initial Conference. The requested adjournment is made in good faith and not for purposes of delay and granting this request will not prejudice any party to this matter.

Thank you for your consideration of this request.

Respectfully submitted,

<u>/s Jaymie Sabilia-Heffert</u> Jaymie Sabilia-Heffert